



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

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JUL 27 2011

OFFICE OF  
COMPLIANCE AND ENFORCEMENT

Reply To: OCE-084

Michael L. Verhaar  
Environmental Affairs Manager  
The Boeing Company  
737 Airplane Program  
M/C 63-74  
PO Box 3703  
Seattle, Washington 98124-2207

Re: Toxic Substances Control Act (TSCA) Risk-Based Disposal Approval for the Cleanup and Disposal of PCB Remediation Waste at the Boeing Plant 2 Facility – Request for Approval Amendment

Dear Mr. Verhaar:

This letter is in response to your e-mail of June 21, 2011, to Dave Bartus of the U.S. Environmental Protection Agency, Region 10 (EPA) (Reference 1) requesting a revision to the Toxic Substances Control Act (TSCA) Risk-Based Approval (RBDA) for the Boeing Plant 2 Facility – First Revision, dated May 25, 2011, (RBDA First Revision, Reference 2). This e-mail requested approval to place crushed concrete with as-found PCBs at concentrations less than 50 mg/kg (<50 ppm concrete) as backfill in any Plant 2 demolition areas that will remain in industrial usage.

#### Background

Boeing's plan for managing <50 ppm concrete, provided to EPA in Reference 3, specifically called out "the Plant 2 tunnels" as the area where such concrete is to be placed as backfill. On this basis, Condition 2 of the RBDA First Revision granted Boeing interim authorization to dispose of concrete with as-found PCB concentrations less than 50 mg/kg in Plant 2 tunnels following crushing. Additional text in Reference 3, however, specifically included nine bulleted items cited from Reference 7. The sixth bulleted item stated that "Backfill will be placed only in areas that will remain in industrial usage (Figure 3 of the approved IM Work Plan, Golder 2010b<sup>1</sup>)." In fact, additional language in Condition 2 of the RBDA First Revision specifically states "The scope of this interim authorization includes bullets 1-6 associated with the plan for demolition and cleanup of the Plant 2 foundation." This language confirms that EPA was aware of and specifically authorized placement of <50 ppm concrete in areas that will remain in industrial use, not just within the Plant 2 tunnels. Therefore, EPA inadvertently created confusion by reference to "Plant 2 tunnels" in Condition 2 of the RBDA First Revision.

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<sup>1</sup> The reference cited as "Golder 2010b" was provided to EPA under cover of Reference 5 in today's letter, and is cited as Reference 7 in today's letter.

## Approval

The EPA is approving, effective as of the date of this letter, Boeing's request for modification of the RBDA First Revision by modifying Condition 2 of the RBDA First Revision to read:

2. Boeing is granted interim authorization to cleanup and sample concrete with as-found PCB concentrations less than 50 mg/kg as documented in Boeing's February 7, 2011 letter (Reference 6), and placement of such concrete in demolition areas that will remain industrial areas that will be subject to engineering and institutional controls and groundwater monitoring as documented in References 6 and 8<sup>2</sup>. Such areas will be considered a unit for disposal of such concrete following crushing. The scope of this interim authorization includes bullets 1-6 associated with the plan for demolition and cleanup of the Plant 2 foundation documented in Reference 6 and 8. Boeing must conduct all sampling and analysis associated with crushed concrete according to a written sampling and analysis plan that specifies all field and analytical laboratory quality assurance/quality control that will be used to document the quality of the resulting analytical data. Boeing must keep records that include the written sampling and analysis plan, documentation of all sampling and analysis conducted according to the sampling and analysis plan, and the quantity and approximate location where crushed concrete subject to this approval is placed. Boeing will ensure that these records are made available to the EPA upon request.

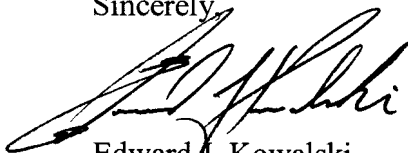
This approval is effective as of the date of this letter.

EPA is including language ensuring that industrial areas where crushed concrete with as-found PCB concentrations less than 50 mg/kg will be placed will be subject to post-placement engineering and institutional controls, and groundwater monitoring, consistent with requirements expected to be documented in the Corrective Measures Report to be submitted to EPA pursuant to Condition 3 of the RBDA First Revision.

The remainder of the RBDA First Revision remains unchanged.

Should you have any questions or comments, please contact Dave Bartus at (206) 553-2804, or [Bartus.dave@epa.gov](mailto:Bartus.dave@epa.gov).

Sincerely,



Edward J. Kowalski  
Director

cc: Shawn Blocker  
EPA

Mark Edens  
Ecology Northwest Regional Office

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<sup>2</sup> The RBDA First Revision cited only Reference 6, which was the immediate Boeing submission upon which the RBDA First Revision was based. The bulleted items in Reference 6 are taken from those originally documented in Reference 8 to the RBDA First Revision, and cited as Reference 7 to today's letter. For purposes of completeness, EPA is citing both References 6 and 8 in Enclosure 1 of the RBDA First Revision in the modified text of Condition 2.

## References:

- 1) E-mail, Edward Abramowski, The Boeing Company, to Dave Bartus, EPA Region 10, dated June 21, 2011.
- 2) Letter, May 25, 2011, Edward J. Kowalski to Michael L. Verhaar, Toxic Substances Control Act (TSCA) Risk-Based Disposal Approval for the Management of PCB materials at the Boeing Plant 2 Facility – First Revision
- 3) Letter, February 7, 2011, Michael L. Verhaar to Edward J. Kowalski, Boeing Plant 2 Demolition Area – 40 CFR 761.61(c) Risk-based disposal approval
- 4) Work Plan, February 4, 2011, Landau Associates for the Boeing Company, Revised Work Plan - TSCA Material Management Plant 2 Demolition Area Seattle, Washington
- 5) Letter, December 9, 2010, William D. Ernst to Shawn Blocker, 2010/2011 Soil and Stormwater Management Interim Measure Work Plan – Demolition Concrete Addendum Boeing Plant 2, Seattle/Tukwila, Washington, EPA ID No. WAD 00925 6819, RCRA Docket No. 1092-01-22-3008(h)
- 6) Letter, December 13, 2010, Shawn Blocker to William D. Ernst, Approval of the Addendum to the Interim Measure Work Plan, 2010/2011 Soil and Stormwater Management Plan, Demolition of Buildings 2-41, 2-44, and 2-49, Boeing Plant 2, Seattle/Tukwila, Washington, Resource Conservation and Recovery Act (RCRA), RCRA Docket No. 1092-01-22-3008(h), EPA ID No. WAD 00925 6819
- 7) Work Plan, “Addendum to Interim Measure Work Plan, 2010/2011 Soil and Stormwater Management Plan, Demolition of Buildings 2-41, 2-44 and 2-49, Boeing Plant 2, Seattle/Tukwila, Washington,” Golder & Assoc., December, 2010.